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15 September 2021  
File No. 129420

TO: Southern Indiana Gas and Electric Company

FROM: Haley & Aldrich, Inc.

SUBJECT: Semi-Annual Remedy Selection Progress Report Pursuant to 40 CFR §257.97(a)  
F.B. Culley Generating Station - East Ash Pond

The Southern Indiana Gas and Electric Company (SIGECO) initiated an evaluation of the nature and extent of contamination and an assessment of corrective measures for the East Ash Pond at the F.B. Culley Generating Station (FBC) on 15 April 2019 in response to a statistically significant level (SSL) of an Appendix IV constituent exceeding Groundwater Protection Standards. Pursuant to 40 CFR §257.96(a), a demonstration of need for a 60-day extension for the assessment of corrective measures was completed on 12 July 2019. The Corrective Measures Assessment (CMA) Report was completed and placed in the facility operating record on 13 September 2019.

Pursuant to the Federal CCR Rule, following completion of the CMA, SIGECO must, as soon as feasible, select a remedy that meets the standards listed in 40 CFR §257.97(b). Pursuant to §257.97(a), the owner or operator of a Coal Combustion Residual (CCR) management unit that has completed a CMA for groundwater shall prepare a semi-annual report describing the progress made in selecting and designing the remedy. This report constitutes the fourth semi-annual remedy selection progress report and documents activities completed during the period of 12 March 2021 through 14 September 2021. A summary of the progress in selecting a remedy is provided below.

#### **SUMMARY OF ACTIONS COMPLETED**

The following actions have been completed during this reporting period:

- Discussions between Haley & Aldrich and SIGECO representatives pertaining to the construction details and impact of various closure by removal alternatives outlined in the CMA have been ongoing.
- The Groundwater Modeling Report has been updated to reflect the refinement of the closure-by-removal source control alternative based on a preliminary post-removal grading design to estimate the resulting effect on post-closure groundwater flow and groundwater quality over time.
- Efforts to corroborate the nature and extent (N&E) of the Appendix IV SSLs continued pursuant to § 257.95(g). Groundwater samples were collected from the N&E monitoring wells in May 2021. The analytical results continue to be used to supplement and enhance the evaluation of the extent of groundwater impacts, the refinement of the groundwater flow and solute

transport model, and assessment of corrective measures. Groundwater characterization of the N&E monitoring wells is ongoing.

- Continued the evaluation of the potential for beneficial use of CCR contained in the EAP.
- Scheduled the public meeting for 18 October 2021;

## PLANNED ACTIVITIES

Anticipated activities for the upcoming six months include the following:

- Conduct semiannual groundwater sampling in November 2021 consistent with §257.95(b) and (d)(1).
- Continue evaluation of the potential for beneficial use of CCR contained in the EAP.
- Hold public meeting on 18 October 2021 and evaluate community input provided at meeting as part of the selection of remedy process.
- At least thirty days (30) after the completion of the public meeting, SIGECO will select a remedy that, at a minimum meets the standards outlined in §257.97(b).
- Once a remedy has been selected, a final remedy selection report will be generated explaining how the remedy meets the standards outlined in §257.97(b).
- Within ninety days (90) of selecting a remedy under §257.97, SIGECO will initiate remedial activities following the procedures outlined in §257.98.